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Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
DISCOVERY, CLASS CERTIFICATION
BRIEFING SCHEDULE, AND
HEARING DATE**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

STIPULATION EXTENDING DISCOVERY, CLASS CERTIFICATION BRIEFING SCHEDULE, AND
HEARING DATE

Case No. 3:20-CV-04688-RS

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”) and Defendant Google LLC (“Google”), collectively referred to as the “Parties,” hereby enter into this joint stipulation.

WHEREAS, on November 22, 2021, the Court granted plaintiffs’ Motion for Relief from Case Management Schedule, extending the deadlines for the close of fact discovery, initial expert witness disclosures, rebuttal expert witness disclosures, and the close of expert discovery (Dkt. 180), and

WHEREAS, on February 1, 2022, the parties stipulated to a new class certification briefing schedule and hearing date consistent with the Court’s November 22, 2021 order (Dkt. 214), which the Court entered on February 1, 2022 (Dkt. 215), and

WHEREAS, the parties have been working diligently to complete discovery in this case pursuant to the Court’s deadlines, and

WHEREAS, until recently, several outstanding discovery issues were pending before the Court that affect the scope of discovery.

WHEREAS, the prior extensions of the case schedule set by the Court have been limited,

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action, that the following dates and deadlines for further proceedings should apply to this case, which amounts to about a 75-day extension of key deadlines in the current schedule:

- Close of Fact Discovery: September 26, 2022
- Initial Expert Witness Disclosures: October 13, 2022
- Rebuttal Expert Witness Disclosures: January 20, 2023
- Close of Expert Discovery: February 16, 2023
- Motion for Class Certification: February 23, 2023
- Opposition to Motion for Class Certification: March 30, 2023
- Reply In Support of Class Certification: April 27, 2023
- Hearing on Class Certification: At the Court’s discretion, but proposed for May 11, 2023 at 1:30 PM

1 A Proposed Order is submitted concurrently herewith.

2 Good cause exists for this slight continuance of the schedule to allow the parties to
3 complete ordered and pursued discovery.

4 IT IS SO STIPULATED.

5
6 DATED: May 20, 2022

WILLKIE FARR & GALLAGHER, LLP

7 By: /s/ Benedict Y. Hur

8 Benedict Y. Hur

9 *Attorneys for Defendant Google LLC*

10 DATED: May 20, 2022

11 By: /s/ Amanda Bonn

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Attorneys for Plaintiff

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: May 20, 2022

SUSMAN GODFREY L.L.P.

/s/ Amanda Bonn

Amanda Bonn

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**[PROPOSED] ORDER EXTENDING
DISCOVERY, CLASS CERTIFICATION
BRIEFING SCHEDULE, AND
HEARING DATE**

Judge: Hon. Richard Seeborg

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**[PROPOSED] ORDER EXTENDING DISCOVERY, CLASS CERTIFICATION BRIEFING SCHEDULE,
AND HEARING DATE**

Case No. 3:20-CV-04688-RS

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the deadlines in this case are extended as follows:

- Close of Fact Discovery: September 26, 2022
- Initial Expert Witness Disclosures: October 13, 2022
- Rebuttal Expert Witness Disclosures: January 20, 2023
- Close of Expert Discovery: February 16, 2023
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- Hearing on Class Certification: May 11, 2023 at 1:30 PM

IT IS SO ORDERED.

Dated: _____

Honorable Richard Seeborg